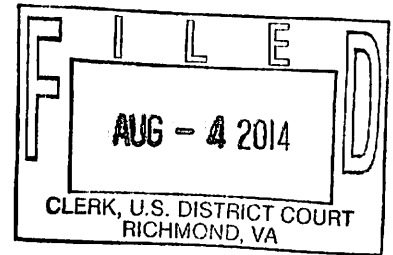


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA,

v.

Action No. 3:14-CR-12-JRS

ROBERT F. MCDONNELL, *et al.*,

Defendants.

MOTION FOR LEAVE TO INTERVENE AND TO VACATE SEALING ORDER

WP Company LLC, d/b/a *The Washington Post*, by counsel, moves (1) for leave to intervene in this criminal action to assert the public right of access to records concerning juror *voir dire*, and (2) for the entry of an order vacating the order entered July 31, 2014 [ECF No. 341] ("Sealing Order") sealing questionnaires that were completed by prospective jurors as part of *voir dire*. As set forth fully in the accompanying memorandum, movant has standing to intervene in this action, and no basis has been established to overcome the public's presumptive right of access under the First Amendment to the jury questionnaires.

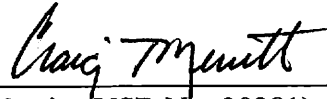
Wherefore, *The Washington Post* respectfully requests (1) that its motion for leave to intervene be granted, (2) that the Court set a prompt hearing so that the movant and the parties be afforded the opportunity to be heard in support of or in opposition to the sealing of the juror questionnaires and answers, and (3) that the Court vacate the Sealing Order, permitting public access to the *voir dire* process used in this action.

Date: August 4, 2014.

Respectfully submitted,

WP COMPANY LLC

By Counsel

A handwritten signature in black ink, reading "Craig T. Merritt", is positioned above a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was delivered by electronic mail this 4th day of August, 2014, to the following counsel of record:

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